

FILED

DEC 9 2008

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SEALED
BY COURT ORDER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JSW

CR 08

0886

UNITED STATES OF AMERICA,

Plaintiff,

v.

YUSEF STERLING and
LATOYA FULBRIGHT,

Defendants.

No.

VIOLATIONS: 21 U.S.C. § 841(a)(1) and
(b)(1)(A)(iii) – Distribution and Possession
with Intent to Distribute 50 Grams or More
of Cocaine Base in the Form of Crack
Cocaine; 21 U.S.C. § 860(a) – Distribution
and Possession with Intent to Distribute
Cocaine Base Within 1,000 Feet of a Public
School, Playground, and Public Housing
Facility; 21 U.S.C. § 846 – Conspiracy to
Distribute or Possess with Intent to
Distribute Cocaine Base.

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about May 2, 2008, in the Northern District of California, the defendants,
YUSEF STERLING and LATOYA FULBRIGHT,
knowingly and intentionally combined, conspired, confederated and agreed together and with
each other to commit the following offenses against the United States:

1. To distribute and possess with intent to distribute a Schedule II controlled substance, to
wit, 50 grams or more of crack cocaine, a mixture and substance which contained cocaine

base.

2. To distribute and possess with intent to distribute a Schedule II controlled substance, to wit, 50 grams or more of crack cocaine, a mixture and substance which contained cocaine base, within 1,000 feet of a housing facility owned by a public housing authority.

All done in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about May 2, 2008, in the Northern District of California, the defendants,

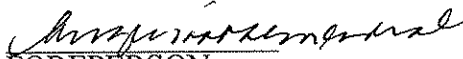
YUSEF STERLING and
LATOYA FULBRIGHT,

aided and abetted each by the other, did knowingly and intentionally distribute and possess with intent to distribute a Schedule II controlled substance, to wit, 50 grams or more of crack cocaine, a mixture and substance which contained cocaine base, within 1,000 feet of a housing facility owned by a public housing authority, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii) and 860(a), and Title 18, United States Code, Section 2.

DATED:


A TRUE BILL.

12/9/08


FOREPERSON

JOSEPH P. RUSSONIELLO
United States Attorney

 12/08/08
JAMES T. CHOU
Chief, Organized Crime Strike Force

(Approved as to form: )

AUSA William Frentzen